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May 22, 2025

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City of Brampton
c/o coa@brampton.ca
Brampton City Hall
2 Wellington Street West, 4th Floor
Toronto, Ontario

Via Courier

Attention: Committee of Adjustment

Dear Members of the Committee,

**Re:- Peel Condominium Corporation No. 344
Opposition to Application for Minor Variance for 30 Delta Park Boulevard
Meeting on Tuesday, May 27, 2025 9:30 AM
Application No. A-2025-0043
Our File No. 1904198913**

I have been retained by Peel Condominium Corporation No. 344 (“**PCC 344**”) to represent the interests of PCC 344 and the owners of several units in PCC 344 (the “**Condo Owners**”) in relation to the above-noted application for a minor variance (the “**Application**”), pursuant to which the owner of the property municipally located at 30 Delta Park Boulevard (the “**Subject Property**”) seeks a variance to permit the operation of a waste transfer and processing station (the “**Waste Transfer Station**”).

PCC 344 and the Condo Owners are opposed to the Application. Please accept this letter and the related attachments as written submissions on their behalf.

The Condominium Property

The condominium property administered by PCC 344 (the “**Condominium**”) directly abuts the Subject Property and is municipally located at 50 and 70 Delta Park Boulevard. The owners use their units for various, light industrial purposes, all in accordance with the zoning by-law.

The Application

The owner of Subject Property, Planchet Ambler Inc. (the “**Applicant**”) authorized its prospec-

tive tenant, RLG Systems Canada Inc. (the “**Tenant**”) to advance the Application in relation to the Subject Property.¹

Pursuant to the Application, the Tenant seeks to construct and operate the Waste Transfer Station. The Tenant alleges that operating the Waste Transfer Station will not be “impactful or nuisance-causing” because, according to the Tenant, there are “no environmental risks or impacts” and there is “no production of noise, vibration, dust, or fugitive odours”.²

A hearing on the Application has been scheduled for May 27, 2025 at 9:30 AM (the “**Hearing**”).

Statements of Opposition and Authorization from Condo Owners

Each of the owners of some 14 units in PCC 344 has executed and provided a Statement of Opposition and Authorization, copies of which are enclosed.

Procedural Objection: Defective Notice of Hearing

The City of Brampton’s Committee of Adjustment (the “**Committee**”) was required to give notice of the Hearing at least 10 days in advance “by personal service or ordinary mail to every owner of land within 60 metres of the area to which the (Application) applies.”³ This notice was required to be given to all owners of PCC 344, or alternatively, to PCC 344, because the owners of PCC 344 are tenants in common of the common elements of the Condominium.⁴

Despite these requirements, I am informed that only a handful of owners of PCC 344 received the Public Meeting Notice from the Committee dated May 12, 2025 (the “**Notice of Hearing**”). I am further informed that PCC 344 did not receive the Notice of Hearing, but only learned about the Hearing from an owner who did receive it; and that certain owners whose very units are within 60 metres of the Subject Property did not receive the Notice of Hearing, but again only learned about the Hearing from an owner who did receive it.

Accordingly, PCC 344 and the Condo Owners object that the Notice of Hearing was invalid and entirely reserve their rights in that respect. Neither these written submissions, nor any appearance at the Hearing, may be construed to compromise or waive those rights.

Substantive Objection: Environmental Risks, Noise and Fugitive Odours

In support of the Application, the Tenant baldly claims that the Waste Transfer Station will not be “impactful or nuisance-causing” because there are allegedly “no environmental risks or impacts” and the Waste Transfer Station will allegedly not produce “noise, vibration, dust, or fugitive odours”.⁵ The Tenant has not produced or cited any evidence in support of these allegations.

¹ Letter from Planchet Ambler Inc. to RLG Systems Canada Inc. dated April 16, 2025

² Letter to Committee of Adjustment from RLG by Reconomy dated 17 April 2025, p. 2.

³ O.Reg. 200/96, s. 3(2)1.

⁴ Condominium Act, 1998, S.O. 1998, c. 19, as am., s. 11(2).

⁵ See note 2.

That the Waste Transfer Station will pose at least some environmental risk, have at least some environmental impact and produce at least some noise and fugitive odours seems self-evident. For that very reason, PCC 344 and the Condo Owners oppose the Application and submit that it should be refused. PCC 344 and the Condo Owners are concerned that the Waste Transfer Station will release unpleasant and fugitive odours, attract pests and generate noxious substances and/or toxins, all of which will adversely affect their ability to enjoy and carry on business at the Condominium.⁶

Alternatively, if the Committee is inclined to consider the environmental risks and potential nuisances, PCC 344 and the Condo Owners submit that:

- a) the Hearing should be adjourned to permit the Applicant and/or Tenant to produce, at their own expense, a study with respect to the environment risks and potential nuisances of the proposed operation of the Waste Transfer Station, to be conducted by a firm of consulting engineers at the expense of the Applicant and/or Tenant; and
- b) upon receipt of the study, PCC 344 and the Condo Owners should be permitted at least six months to review the study and if deemed advisable, produce a response for the benefit of the Committee.

Participation in the Hearing

Please register me to participate virtually in the Hearing on behalf of PCC 344 and the Condo Owners. My name, mailing address, phone number and e-mail address are provided above.

All of which is respectfully submitted,

DEACON, SPEARS, FEDSON + MONTIZAMBERT



Michael J. Campbell

Enclosures: as listed above

⁶ See Statements of Opposition and Authorization, enclosed.

**IN THE MATTER OF
the Committee of Adjustment for the City of Brampton**

**AND IN THE MATTER OF
an Application for Minor Variance
under Application No. A-2025-0043**

STATEMENT OF OPPOSITION AND AUTHORIZATION

1. My/Our name(s) is/are James coey. I/We am/are the Owner(s) of the unit contained within Peel Condominium Plan No. 344 and municipally located at 70 Delta Park Boulevard, Suite 8-9, Brampton, Ontario (the “**Neighbouring Property**”).
2. I/We use the Neighbouring Property to 30 delta park.
3. I/We am/are aware of the application for a minor variance (Application No. A-2025-0043) (the “**Application**”) so as to permit a waste transfer/processing station to be constructed at 30 Delta Park Boulevard, Brampton, Ontario.
4. I/We oppose the Application on several grounds. Among other things, I/we am/are concerned that the waste transfer/processing station will, despite the unsupported assertions contained in the application materials, release unpleasant and fugitive odours, attract pests and generate noxious substances and/or toxins, all of which will adversely affect my/our ability to enjoy the Neighbouring Property and carry on business at the Neighbouring Property.
5. I/We authorize Peel Condominium Corporation No. 344, through its lawyers, Deacon, Spears, Fedson + Montizambert, to take the following steps on my/our behalf:
 - a) make written submissions on my/our behalf; and
 - b) participate in the hearing of the Application, either in person or virtually, on May 27, 2025, or any adjournment thereof.

Dated: May 19 2025

James coey
Print Name:

Print Name:

**IN THE MATTER OF
the Committee of Adjustment for the City of Brampton**

**AND IN THE MATTER OF
an Application for Minor Variance
under Application No. A-2025-0043**

STATEMENT OF OPPOSITION AND AUTHORIZATION

1. My/Our name(s) is/are Mahendra Patel 1354725 Ontario Inc. I/We am/are the Owner(s) of the unit contained within Peel Condominium Plan No. 344 and municipally located at 70 Delta Park Boulevard, Suite 7, Brampton, Ontario (the “**Neighbouring Property**”).
2. I/We use the Neighbouring Property to Operate Notify Fire Protection
3. I/We am/are aware of the application for a minor variance (Application No. A-2025-0043) (the “**Application**”) so as to permit a waste transfer/processing station to be constructed at 30 Delta Park Boulevard, Brampton, Ontario.
4. I/We oppose the Application on several grounds. Among other things, I/we am/are concerned that the waste transfer/processing station will, despite the unsupported assertions contained in the application materials, release unpleasant and fugitive odours, attract pests and generate noxious substances and/or toxins, all of which will adversely affect my/our ability to enjoy the Neighbouring Property and carry on business at the Neighbouring Property.
5. I/We authorize Peel Condominium Corporation No. 344, through its lawyers, Deacon, Spears, Fedson + Montizambert, to take the following steps on my/our behalf:
 - a) make written submissions on my/our behalf; and
 - b) participate in the hearing of the Application, either in person or virtually, on May 27, 2025, or any adjournment thereof.

Dated: May 20, 2025

Mahendra Patel
Print Name:

Print Name:

**IN THE MATTER OF
the Committee of Adjustment for the City of Brampton**

**AND IN THE MATTER OF
an Application for Minor Variance
under Application No. A-2025-0043**

STATEMENT OF OPPOSITION AND AUTHORIZATION

1. My/Our name(s) is/are Tony Diodati. I/We am/are the Owner(s) of the unit contained within Peel Condominium Plan No. 344 and municipally located at 50 Delta Park Boulevard, Suite 7, Brampton, Ontario (the “**Neighbouring Property**”).
2. I/We use the Neighbouring Property to nothing.
3. I/We am/are aware of the application for a minor variance (Application No. A-2025-0043) (the “**Application**”) so as to permit a waste transfer/processing station to be constructed at 30 Delta Park Boulevard, Brampton, Ontario.
4. I/We oppose the Application on several grounds. Among other things, I/we am/are concerned that the waste transfer/processing station will, despite the unsupported assertions contained in the application materials, release unpleasant and fugitive odours, attract pests and generate noxious substances and/or toxins, all of which will adversely affect my/our ability to enjoy the Neighbouring Property and carry on business at the Neighbouring Property.
5. I/We authorize Peel Condominium Corporation No. 344, through its lawyers, Deacon, Spears, Fedson + Montizambert, to take the following steps on my/our behalf:
 - a) make written submissions on my/our behalf; and
 - b) participate in the hearing of the Application, either in person or virtually, on May 27, 2025, or any adjournment thereof.

Dated: May 20 2025

Tony Diodati
Print Name:

Print Name:

**IN THE MATTER OF
the Committee of Adjustment for the City of Brampton**

**AND IN THE MATTER OF
an Application for Minor Variance
under Application No. A-2025-0043**

STATEMENT OF OPPOSITION AND AUTHORIZATION

1. My/Our name(s) is/are 2435328 Ontario LTD. I/We am/are the Owner(s) of the unit contained within Peel Condominium Plan No. 344 and municipally located at 70 Delta Park Boulevard, Suite 6, Brampton, Ontario (the “**Neighbouring Property**”).
2. I/We use the Neighbouring Property to leased to Cabinet Maker.
3. I/We am/are aware of the application for a minor variance (Application No. A-2025-0043) (the “**Application**”) so as to permit a waste transfer/processing station to be constructed at 30 Delta Park Boulevard, Brampton, Ontario.
4. I/We oppose the Application on several grounds. Among other things, I/we am/are concerned that the waste transfer/processing station will, despite the unsupported assertions contained in the application materials, release unpleasant and fugitive odours, attract pests and generate noxious substances and/or toxins, all of which will adversely affect my/our ability to enjoy the Neighbouring Property and carry on business at the Neighbouring Property.
5. I/We authorize Peel Condominium Corporation No. 344, through its lawyers, Deacon, Spears, Fedson + Montizambert, to take the following steps on my/our behalf:
 - a) make written submissions on my/our behalf; and
 - b) participate in the hearing of the Application, either in person or virtually, on May 27, 2025, or any adjournment thereof.

Dated: May 20, 2025

Devis Nascimben
Print Name:

Print Name:

**IN THE MATTER OF
the Committee of Adjustment for the City of Brampton**

**AND IN THE MATTER OF
an Application for Minor Variance
under Application No. A-2025-0043**

STATEMENT OF OPPOSITION AND AUTHORIZATION

1. My/Our name(s) is/are 1000222216 Ontario Inc.. I/We am/are the Owner(s) of the unit contained within Peel Condominium Plan No. 344 and municipally located at 50 Delta Park Boulevard, Suite 5, Brampton, Ontario (the “**Neighbouring Property**”).
2. I/We use the Neighbouring Property to Truck Driving School.
3. I/We am/are aware of the application for a minor variance (Application No. A-2025-0043) (the “**Application**”) so as to permit a waste transfer/processing station to be constructed at 30 Delta Park Boulevard, Brampton, Ontario.
4. I/We oppose the Application on several grounds. Among other things, I/we am/are concerned that the waste transfer/processing station will, despite the unsupported assertions contained in the application materials, release unpleasant and fugitive odours, attract pests and generate noxious substances and/or toxins, all of which will adversely affect my/our ability to enjoy the Neighbouring Property and carry on business at the Neighbouring Property.
5. I/We authorize Peel Condominium Corporation No. 344, through its lawyers, Deacon, Spears, Fedson + Montizambert, to take the following steps on my/our behalf:
 - a) make written submissions on my/our behalf; and
 - b) participate in the hearing of the Application, either in person or virtually, on May 27, 2025, or any adjournment thereof.

Dated: 20/05/2025

Lakhvinder singh
Print Name:

Print Name:

**IN THE MATTER OF
the Committee of Adjustment for the City of Brampton**

**AND IN THE MATTER OF
an Application for Minor Variance
under Application No. A-2025-0043**

STATEMENT OF OPPOSITION AND AUTHORIZATION

1. My/Our name(s) is/are Sean Jennings. I/We am/are the Owner(s) of the unit contained within Peel Condominium Plan No. 344 and municipally located at 70 Delta Park Boulevard, Suite 3, Brampton, Ontario (the “**Neighbouring Property**”).
2. I/We use the Neighbouring Property to 30 Delta Park Blvd.
3. I/We am/are aware of the application for a minor variance (Application No. A-2025-0043) (the “**Application**”) so as to permit a waste transfer/processing station to be constructed at 30 Delta Park Boulevard, Brampton, Ontario.
4. I/We oppose the Application on several grounds. Among other things, I/we am/are concerned that the waste transfer/processing station will, despite the unsupported assertions contained in the application materials, release unpleasant and fugitive odours, attract pests and generate noxious substances and/or toxins, all of which will adversely affect my/our ability to enjoy the Neighbouring Property and carry on business at the Neighbouring Property.
5. I/We authorize Peel Condominium Corporation No. 344, through its lawyers, Deacon, Spears, Fedson + Montizambert, to take the following steps on my/our behalf:
 - a) make written submissions on my/our behalf; and
 - b) participate in the hearing of the Application, either in person or virtually, on May 27, 2025, or any adjournment thereof.

Dated: May 20 2025

Sean Jennings
Print Name:

Print Name:

**IN THE MATTER OF
the Committee of Adjustment for the City of Brampton**

**AND IN THE MATTER OF
an Application for Minor Variance
under Application No. A-2025-0043**

STATEMENT OF OPPOSITION AND AUTHORIZATION

1. My/Our name(s) is/are Michael Perri. I/We am/are the Owner(s) of the unit contained within Peel Condominium Plan No. 344 and municipally located at 70 Delta Park Boulevard, Suite 2, Brampton, Ontario (the “**Neighbouring Property**”).
2. I/We use the Neighbouring Property to 30 Delta Park Blvd.
3. I/We am/are aware of the application for a minor variance (Application No. A-2025-0043) (the “**Application**”) so as to permit a waste transfer/processing station to be constructed at 30 Delta Park Boulevard, Brampton, Ontario.
4. I/We oppose the Application on several grounds. Among other things, I/we am/are concerned that the waste transfer/processing station will, despite the unsupported assertions contained in the application materials, release unpleasant and fugitive odours, attract pests and generate noxious substances and/or toxins, all of which will adversely affect my/our ability to enjoy the Neighbouring Property and carry on business at the Neighbouring Property.
5. I/We authorize Peel Condominium Corporation No. 344, through its lawyers, Deacon, Spears, Fedson + Montizambert, to take the following steps on my/our behalf:
 - a) make written submissions on my/our behalf; and
 - b) participate in the hearing of the Application, either in person or virtually, on May 27, 2025, or any adjournment thereof.

Dated: Tues May 20th 2025

Michael Perri
Print Name:

Print Name:

**IN THE MATTER OF
the Committee of Adjustment for the City of Brampton**

**AND IN THE MATTER OF
an Application for Minor Variance
under Application No. A-2025-0043**

STATEMENT OF OPPOSITION AND AUTHORIZATION

1. My/Our name(s) is/are Henry Tojas. I/We am/are the Owner(s) of the unit contained within Peel Condominium Plan No. 344 and municipally located at 70 Delta Park Boulevard, Suite 1, Brampton, Ontario (the “**Neighbouring Property**”).
2. I/We use the Neighbouring Property to 30 Delta Park.
3. I/We am/are aware of the application for a minor variance (Application No. A-2025-0043) (the “**Application**”) so as to permit a waste transfer/processing station to be constructed at 30 Delta Park Boulevard, Brampton, Ontario.
4. I/We oppose the Application on several grounds. Among other things, I/we am/are concerned that the waste transfer/processing station will, despite the unsupported assertions contained in the application materials, release unpleasant and fugitive odours, attract pests and generate noxious substances and/or toxins, all of which will adversely affect my/our ability to enjoy the Neighbouring Property and carry on business at the Neighbouring Property.
5. I/We authorize Peel Condominium Corporation No. 344, through its lawyers, Deacon, Spears, Fedson + Montizambert, to take the following steps on my/our behalf:
 - a) make written submissions on my/our behalf; and
 - b) participate in the hearing of the Application, either in person or virtually, on May 27, 2025, or any adjournment thereof.

Dated: May 20, 2025

Henry Rojas
Print Name:

Print Name:

**IN THE MATTER OF
the Committee of Adjustment for the City of Brampton**

**AND IN THE MATTER OF
an Application for Minor Variance
under Application No. A-2025-0043**

STATEMENT OF OPPOSITION AND AUTHORIZATION

1. My/Our name(s) is/are 112-6069 Ontario LTD I/We am/are the Owner(s) of the unit contained within Peel Condominium Plan No. 344 and municipally located at 50 Delta Park Boulevard, Suite 142, Brampton, Ontario (the "**Neighbouring Property**").
2. I/We use the Neighbouring Property to Tue Shop.
3. I/We am/are aware of the application for a minor variance (Application No. A-2025-0043) (the "**Application**") so as to permit a waste transfer/processing station to be constructed at 30 Delta Park Boulevard, Brampton, Ontario.
4. I/We oppose the Application on several grounds. Among other things, I/we am/are concerned that the waste transfer/processing station will, despite the unsupported assertions contained in the application materials, release unpleasant and fugitive odours, attract pests and generate noxious substances and/or toxins, all of which will adversely affect my/our ability to enjoy the Neighbouring Property and carry on business at the Neighbouring Property.
5. I/We authorize Peel Condominium Corporation No. 344, through its lawyers, Deacon, Spears, Fedson + Montizambert, to take the following steps on my/our behalf:
 - a) make written submissions on my/our behalf; and
 - b) participate in the hearing of the Application, either in person or virtually, on May 27, 2025, or any adjournment thereof.

Dated: May 20 25

KEVIN CROFT
Print Name:

Print Name:

**IN THE MATTER OF
the Committee of Adjustment for the City of Brampton**

**AND IN THE MATTER OF
an Application for Minor Variance
under Application No. A-2025-0043**

STATEMENT OF OPPOSITION AND AUTHORIZATION

1. My/Our name(s) is/are Mina Maninder Dhaliwal. I/We am/are the Owner(s) of the unit contained within Peel Condominium Plan No. 344 and municipally located at 70 Delta Park Boulevard, Suite 13, Brampton, Ontario (the “**Neighbouring Property**”).
2. I/We use the Neighbouring Property to 30 Delta Park Blvd Brampton ON
3. I/We am/are aware of the application for a minor variance (Application No. A-2025-0043) (the “**Application**”) so as to permit a waste transfer/processing station to be constructed at 30 Delta Park Boulevard, Brampton, Ontario.
4. I/We oppose the Application on several grounds. Among other things, I/we am/are concerned that the waste transfer/processing station will, despite the unsupported assertions contained in the application materials, release unpleasant and fugitive odours, attract pests and generate noxious substances and/or toxins, all of which will adversely affect my/our ability to enjoy the Neighbouring Property and carry on business at the Neighbouring Property.
5. I/We authorize Peel Condominium Corporation No. 344, through its lawyers, Deacon, Spears, Fedson + Montizambert, to take the following steps on my/our behalf:
 - a) make written submissions on my/our behalf; and
 - b) participate in the hearing of the Application, either in person or virtually, on May 27, 2025, or any adjournment thereof.

Dated: May 20 2025

Mina Maninder Dhaliwal
Print Name:

Print Name:

**IN THE MATTER OF
the Committee of Adjustment for the City of Brampton**

**AND IN THE MATTER OF
an Application for Minor Variance
under Application No. A-2025-0043**

STATEMENT OF OPPOSITION AND AUTHORIZATION

Surjit Padda

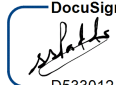
1. My/Our name(s) is/are _____. I/We am/are the Owner(s) of the unit contained within Peel Condominium Plan No. 344 and municipally located at 70 Delta Park Boulevard, Suite 11, Brampton, Ontario (the “**Neighbouring Property**”).
2. I/We use the Neighbouring Property to 30 Delta Park Blvd, Brampton ON L6T 5E9.
3. I/We am/are aware of the application for a minor variance (Application No. A-2025-0043) (the “**Application**”) so as to permit a waste transfer/processing station to be constructed at 30 Delta Park Boulevard, Brampton, Ontario.
4. I/We oppose the Application on several grounds. Among other things, I/we am/are concerned that the waste transfer/processing station will, despite the unsupported assertions contained in the application materials, release unpleasant and fugitive odours, attract pests and generate noxious substances and/or toxins, all of which will adversely affect my/our ability to enjoy the Neighbouring Property and carry on business at the Neighbouring Property.
5. I/We authorize Peel Condominium Corporation No. 344, through its lawyers, Deacon, Spears, Fedson + Montizambert, to take the following steps on my/our behalf:
 - a) make written submissions on my/our behalf; and
 - b) participate in the hearing of the Application, either in person or virtually, on May 27, 2025, or any adjournment thereof.

5/21/2025

Surjit Padda

Dated: _____

Print Name:

DocuSigned by:

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Print Name:

**IN THE MATTER OF
the Committee of Adjustment for the City of Brampton**

**AND IN THE MATTER OF
an Application for Minor Variance
under Application No. A-2025-0043**

STATEMENT OF OPPOSITION AND AUTHORIZATION

1. My/Our name(s) is/are wilfred Abraham. I/We am/are the Owner(s) of the unit contained within Peel Condominium Plan No. 344 and municipally located at 70 Delta Park Boulevard, Suite 10, Brampton, Ontario (the “**Neighbouring Property**”).
2. I/We use the Neighbouring Property to 30 Delta Park Blvd.
3. I/We am/are aware of the application for a minor variance (Application No. A-2025-0043) (the “**Application**”) so as to permit a waste transfer/processing station to be constructed at 30 Delta Park Boulevard, Brampton, Ontario.
4. I/We oppose the Application on several grounds. Among other things, I/we am/are concerned that the waste transfer/processing station will, despite the unsupported assertions contained in the application materials, release unpleasant and fugitive odours, attract pests and generate noxious substances and/or toxins, all of which will adversely affect my/our ability to enjoy the Neighbouring Property and carry on business at the Neighbouring Property.
5. I/We authorize Peel Condominium Corporation No. 344, through its lawyers, Deacon, Spears, Fedson + Montizambert, to take the following steps on my/our behalf:
 - a) make written submissions on my/our behalf; and
 - b) participate in the hearing of the Application, either in person or virtually, on May 27, 2025, or any adjournment thereof.

Dated: 20th May 2025

WILFRED ABRAHAM
Print Name:

Print Name: